



South Carolina
DEPARTMENT OF CONSUMER AFFAIRS
293 Greystone Boulevard Suite 400
P. O. BOX 5757
COLUMBIA, SC 29250-5757

Carri Grube Lybarker
Administrator/
Consumer Advocate

PROTECTING CONSUMERS SINCE 1975

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Summerville

December 7, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Docket No. 2021-349-E
Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to
Request the Commission Hold a Joint Hearing with the North Carolina Utilities
Commission to Develop Carbon Plan.

Dear Ms. Boyd:

Please find enclosed for filing the Petition to Intervene on behalf of the South Carolina
Department of Consumer Affairs. As indicated on the Certificate of Service, all parties of record
will be served via electronic mail.

Regards,

Roger Hall, Esq.
Deputy Consumer Advocate

Enclosures

Cc: Parties of Record (via email)

ADMINISTRATOR
Tel.: (803) 734-4233

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INFORMATION
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LICENSING
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CONSUMER
COMPLAINTS
Tel.: (803) 734-4200

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PROCUREMENT &
ACCOUNTING
Tel.: (803) 734-4264

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-349-E**

IN RE:)
)
JOINT APPLICATION OF DUKE)
ENERGY CAROLINAS, LLC AND)
DUKE ENERGY PROGRESS, LLC TO)
REQUEST THE COMMISSION HOLD)
A JOINT HEARING WITH THE NORTH)
CAROLINA UTILITIES COMMISSION)
TO DEVELOP CARBON PLAN)
_____)

PETITION TO INTERVENE

Carri Grube Lybarker, Administrator and Consumer Advocate for the South Carolina Department of Consumer Affairs (“Department”), respectfully petitions the South Carolina Public Service Commission (“Commission”) for permission to intervene in the above referenced Docket pursuant to R. 103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioner states as follows:

1. Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) have filed a joint application with the Commission requesting the Commission undertake a coordinated joint proceeding with the North Carolina Utilities Commission (the “NCUC”) to develop the Carbon Plan required by N.C. Gen. Stat. §§ 62-2, 62-30, Part I of Session Law 2021-165 (“HB 951”).

2. Pursuant to S.C. Code Ann. § 37-6-604 (2018), the Department may provide legal representation of the consumer interest before state and federal regulatory agencies when such agencies undertake to fix rates or prices for consumer products or services and may intervene as a party to advocate for the interest of consumers before the South Carolina Public Service Commission. In that capacity the Consumer Advocate does hereby petition to intervene as a formal party of record in Docket No. 2021-349-E

3. The Department works to avoid excessive, inadequate, and unwarranted rate increases. Upon information and belief, the application of DEC and DEP may impact rates for South Carolina consumers; however, the Department’s position has not yet been fully developed

on this matter. Petitioner reserves the right to set forth her position more fully as necessary and appropriate as this proceeding moves forward.

4. Counsel representing the Consumer Advocate/Department in this proceeding are:

Carri Grube Lybarker, Esquire
Roger P. Hall, Esquire
Connor J. Parker, Esquire
S.C. Department of Consumer Affairs
293 Greystone Blvd., Suite 400
P.O. Box 5757
Columbia, South Carolina 29250-5757
Phone: (803) 734-0045
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5. The Consumer Advocate/Department consent to service via electronic mail and request all communications regarding this docket be directed to counsel of record noted above.

WHEREFORE, Petitioner, in order to represent the consumer interest of the State of South Carolina, requests the Commission grant this Petition to Intervene and make Petitioner a formal party of record, allowing Petitioner to actively participate in this proceeding.

Carri Grube Lybarker, Esquire
Administrator / Consumer Advocate

By: s/ Carri Grube Lybarker
S.C. Department of Consumer Affairs
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Columbia, South Carolina 29250-5757
Phone: (803) 734-0045

December 7, 2021
Columbia, South Carolina

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TO DEVELOP CARBON PLAN)
_____)

CERTIFICATE OF SERVICE

I hereby certify I have caused to be served this day the **Petition to Intervene** to the individuals listed below via electronic mail as follows:

Weston Adams III
Email: weston.adams@nelsonmullins.com
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s/ Joan Williams
Joan Williams, Paralegal

December 7, 2021
Columbia, South Carolina